

**Rodney D. Oliver**

Pro Se Defendant

11074 Oso Ave

Chatsworth CA 91311

Rodneyolivermusic@gmail.com

July 25,2025

Hon. Denise L. Cote

United States District Court

Southern District of New York

500 Pearl Street

New York, NY 10007

Re: Oliver v. The Barry White Family Trust

Case No. 1:24-cv-07509 (DLC)

Response to Plaintiffs' Motion for Sanctions

Dear Judge Cote:

I respectfully submit this letter in response to Plaintiffs' Motion for Sanctions. I am appearing pro se and have done my best to comply with the Court's orders and discovery requirements under challenging personal and legal circumstances. I understand the seriousness of the Court's expectations, and I am doing everything in my power to meet them.

Since the initial case management conference, I have been actively seeking legal representation and have also worked closely with the SDNY Federal Pro Se Clinic for guidance. While I remain unrepresented, I have made every effort to follow proper procedures and timelines, and to respond to all discovery demands in good faith.

I provided document productions on July 15 and July 18, which included files prepared with descriptive labeling and reference points in lieu of traditional Bates stamping. These were submitted in response to discovery demands and further clarified through meet-and-confer correspondence. I also consented to scheduling deposition dates and agreed to extend the discovery deadline to facilitate cooperation.

I understand that the Court prefers to address substantive legal arguments, such as ownership and standing, at the summary judgment stage. Therefore, I am not using this letter to refute Plaintiffs' claims point by point, but rather to affirm my commitment to resolving this case fairly and on the merits.

I respectfully request that the Court allow the case to proceed to summary judgment. Plaintiffs' motion for default judgment or striking of defenses is not warranted where I have made sincere and substantial efforts to comply. Procedural sanctions that would terminate my ability to present my defense would, in my view, be unjust.

In addition, I respectfully note that I should not be held responsible for the actions or omissions of Ms. Necole Key, who is not a party to this litigation and who operates independently of me. She declined to provide certain emails upon request, citing an ongoing obligation to respond to Plaintiffs' counsel directly.

Despite these challenges, I remain fully committed to fulfilling all obligations and appearing at depositions or hearings as required. I am eager to have the facts heard and judged properly and respectfully ask that I be given the opportunity to do so.

Thank you for your time and consideration.

Respectfully,

/s/Rodney D. Oliver

Pro Se Defendant

11074 Oso Ave

Chatsworth CA 91311

[Rodneyolivermusic@gmail.com](mailto:Rodneyolivermusic@gmail.com)



Best,  
Jacob

Jacob Prince  
SDNY Federal Pro Se  
Clinic  
City Bar Justice Center  
(332) 228-2364



**Rodney** Jul 1

Thank you for your continue  
guidance. OK I'll reserve



---

## DEFENDANTS ANSWERS/RESPONSES AND PRODUCTION

7 messages

---

**Rodney** <rodneylivermusic@gmail.com>

Fri, Jul 18, 2025 at 10:07 AM

To: Dorothy Weber <dorothy@musiclaw.com>, jameyers68@gmail.com



Ms. Weber

I have attached everything I can in my possession. I haven't continued to be working in good faith despite your claims of me having not too. I even went as far as to prepare them as close as I possibly could to the legal standard and what you're used to to avoid any confusion but it seems that that delay has caused me scrutiny in court

Please see attached.

---

### 2 attachments

-  **JULY 16, 2025.docx (1).pdf**  
67 KB
-  **Rodney\_Oliver\_Discovery\_Complete\_Merged (1).pdf**  
283 KB

---

**Dorothy Weber** <dorothy@musiclaw.com>

Fri, Jul 18, 2025 at 11:12 AM

To: Rodney <rodneylivermusic@gmail.com>, Judith Meyers <judy@musiclaw.com>

Dear Mr. Oliver: Would you kind provide the name of the counsel to whom you refer in your privilege log. Thank you in advance for your cooperation.

Dorothy M. Weber, Esq.

Herbsman Hafer Weber & Frisch, LLP

494 Eighth Avenue, Suite 600

New York, NY 10001

Direct Dial: (646) 795-6068

Fax: (212) 956-6471

E-Mail: [dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)

<http://www.linkedin.com/in/dorothymweberesq/>

[Quoted text hidden]

---

**Rodney** <rodneyolivermusic@gmail.com>  
To: Dorothy Weber <dorothy@musiclaw.com>

Fri, Jul 18, 2025 at 11:16 AM

Sorry Ryan Powers and Fox Rothschild sorry I assumed you knew since you dealt with them.

[Quoted text hidden]

---

**Ricardo Rosado** <ricardo@musiclaw.com>  
To: Rodney <rodneyolivermusic@gmail.com>  
Cc: Dorothy Weber <dorothy@musiclaw.com>, Judith Meyers <judy@musiclaw.com>

Mon, Jul 21, 2025 at 2:24 PM

Dear Mr. Oliver,

In reviewing the documents that you provided, no bates-stamped documents have been produced. Can you send the bates-stamped documents that you reference?

Sincerely,

Ricardo Rosado

Legal Assistant to Dorothy M. Weber, Esq.

Herbsman, Hafer, Weber & Frisch, LLP

494 Eighth Avenue, 6th Floor

New York, New York 10001

Phone: 646 – 795 - 6064

Fax: (212) 956-6471

Email: [ricardo@musiclaw.com](mailto:ricardo@musiclaw.com)

---

**From:** Rodney <[rodneyolivermusic@gmail.com](mailto:rodneyolivermusic@gmail.com)>  
**Sent:** Friday, July 18, 2025 1:08 PM  
**To:** Dorothy Weber <[dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)>; [jameyers68@gmail.com](mailto:jameyers68@gmail.com)  
**Subject:** DEFENDANTS ANSWERS/RESPONSES AND PRODUCTION

Ms. Weber

[Quoted text hidden]

---

**Rodney** <rodneyolivermusic@gmail.com>

Mon, Jul 21, 2025 at 2:37 PM

To: Ricardo Rosado <ricardo@musiclaw.com>  
Cc: Dorothy Weber <dorothy@musiclaw.com>, Judith Meyers <judy@musiclaw.com>, Joe Cooley <cooleyjoe011@gmail.com>

Ms. Weber

I provided cover sheets that reference the bates stamp of the documents following

I did the best I could in order to get them to you, since you told the judge I was refusing.

Ms. Weber are your responses your final submission. You still haven't providing proof of having the authority to file this lawsuit. I asked you directly for the documents that state you do. You also refuse to provide where in the deposit sheet music that I allegedly copied. Also are you going to provide that letter by Warner you told the judge you would to prove joint ownership? I can not find that joint ownership agreement in the documents you sent over.

Thanks for your attention to this

Rodney

[Quoted text hidden]

---

**Dorothy Weber** <dorothy@musiclaw.com>

Mon, Jul 21, 2025 at 2:40 PM

To: Rodney <rodneyolivermusic@gmail.com>, Ricardo Rosado <ricardo@musiclaw.com>

Cc: Judith Meyers <judy@musiclaw.com>, Joe Cooley <cooleyjoe011@gmail.com>

Ricardo simply told you that we did not receive the documents that you had identified as being bates stamped. If you emailed them, Ricardo is simply asking that you re-send them since we did not receive the first set. Thank you in advance.

Dorothy M. Weber, Esq.

Herbsman Hafer Weber & Frisch, LLP

494 Eighth Avenue, Suite 600

New York, NY 10001

Direct Dial: (646) 795-6068

Fax: (212) 956-6471

E-Mail: [dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)

<http://www.linkedin.com/in/dorothymweberesq/>

[Quoted text hidden]

---

**Rodney** <rodneyolivermusic@gmail.com>

Mon, Jul 21, 2025 at 2:43 PM

Draft To: Dorothy Weber <dorothy@musiclaw.com>

On Mon, Jul 21, 2025, 2:40 PM Dorothy Weber <[dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)> wrote:

Ricardo simply told you that we did not receive the documents that you had identified as being bates stamped. If you emailed them, Ricardo is simply asking that you re-send them since we did not receive the first set. Thank you in advance.

Dorothy M. Weber, Esq.

Herbsman Hafer Weber & Frisch, LLP

494 Eighth Avenue, Suite 600

New York, NY 10001

Direct Dial: (646) 795-6068

Fax: (212) 956-6471

E-Mail: [dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)

<http://www.linkedin.com/in/dorothymweberesq/>

---

**From:** Rodney <[rodneyolivermusic@gmail.com](mailto:rodneyolivermusic@gmail.com)>

**Sent:** Monday, July 21, 2025 5:37 PM

**To:** Ricardo Rosado <[ricardo@musiclaw.com](mailto:ricardo@musiclaw.com)>

**Cc:** Dorothy Weber <[dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)>; Judith Meyers <[judy@musiclaw.com](mailto:judy@musiclaw.com)>; Joe Cooley <[cooleyjoe011@gmail.com](mailto:cooleyjoe011@gmail.com)>

**Subject:** Re: DEFENDANTS ANSWERS/RESPONSES AND PRODUCTION

Ms. Weber

I provided cover sheets that reference the bates stamp of the documents following

I did the best I could in order to get them to you, since you told the judge I was refusing.

Ms. Weber are your responses your final submission. You still haven't providing proof of having the authority to file this lawsuit. I asked you directly for the documents that state you do. You also refuse to provide where in the deposit sheet music that I allegedly copied. Also are you going to provide that

Thanks for your attention to this

Rodney

On Mon, Jul 21, 2025, 2:24 PM Ricardo Rosado <[ricardo@musiclaw.com](mailto:ricardo@musiclaw.com)> wrote:

Dear Mr. Oliver,

In reviewing the documents that you provided, no bates-stamped documents have been produced. Can you send the bates-stamped documents that you reference?

Sincerely,

Ricardo Rosado

Legal Assistant to Dorothy M. Weber, Esq.

Herbsman, Hafer, Weber & Frisch, LLP

494 Eighth Avenue, 6th Floor

New York, New York 10001

Phone: 646 – 795 - 6064

Fax: (212) 956-6471

Email: [ricardo@musiclaw.com](mailto:ricardo@musiclaw.com)

---

**From:** Rodney <[rodneyolivermusic@gmail.com](mailto:rodneyolivermusic@gmail.com)>

**Sent:** Friday, July 18, 2025 1:08 PM

**To:** Dorothy Weber <[dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)>; [jameyers68@gmail.com](mailto:jameyers68@gmail.com)

**Subject:** DEFENDANTS ANSWERS/RESPONSES AND PRODUCTION

Ms. Weber

I have attached everything I can in my possession. I haven't continued to be working in good faith despite your claims of me having not too. I even went as far as to prepare them as close as I possibly could to the legal standard and what you're used to to avoid any confusion but it seems that that delay has caused me scrutiny in court







---

## Discovery Meet and Confer

3 messages

---

**Dorothy Weber** <dorothy@musiclaw.com>

Thu, Jul 17, 2025 at 8:37 AM

To: Rodney <rodneyolivermusic@gmail.com>, Joe Cooley <cooleyjoe011@gmail.com>

Gentlemen: We would like to ask the court for a one month extension on fact discovery to give us time to set up the depositions on mutually agreeable dates and also permit time for potential mediation. We suggest September 1, 2025 and we agree that it will not otherwise affect any of the dates in the order. Please let me know so I can advise the Court.

Thank you in advance.

Very truly yours,

Dorothy M. Weber, Esq.

Herbsman Hafer Weber & Frisch, LLP

494 Eighth Avenue, Suite 600

New York, NY 10001

Direct Dial: (646) 795-6068

Fax: (212) 956-6471

E-Mail: [dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)

<http://www.linkedin.com/in/dorothymweberesq/>

---

**Rodney** <rodneyolivermusic@gmail.com>

Thu, Jul 17, 2025 at 11:32 AM

To: Dorothy Weber <dorothy@musiclaw.com>

Cc: Joe Cooley <cooleyjoe011@gmail.com>

Hello Ms. Weber

That is fine with both of us.

I will be sending over my response and production by the end of the day. I am proof reading my answers now.

Thank you

Rodney Oliver  
[Quoted text hidden]

---

**Dorothy Weber** <dorothy@musiclaw.com>  
To: Rodney <rodneyolivermusic@gmail.com>  
Cc: Joe Cooley <cooleyjoe011@gmail.com>

Thu, Jul 17, 2025 at 11:37 AM

Thank you both...I will send you a draft of the letter for your approval before we send it to the Court

[Quoted text hidden]



---

## DISCOVERY REQUEST

2 messages

---

**Rodney** <rodneyolivermusic@gmail.com>

Wed, Jul 16, 2025 at 7:37 AM

To: Dorothy Weber <dorothy@musiclaw.com>, Joe Cooley <cooleyjoe011@gmail.com>, jameyers68@gmail.com

Ms Weber

I have been working around the clock to gather all that I could. Spent the night learning about bates numbering. I will be numbering them today and send them to you as soon as I am finished. I am not refusing or trying to delay. Please stop saying I am. I am doing all I can.

Regarding Deposition. I request to do so remotely. I do not have the funds to go to New York.

Thank you

Rodney Oliver

---

**Dorothy Weber** <dorothy@musiclaw.com>

Wed, Jul 16, 2025 at 9:13 AM

To: Rodney <rodneyolivermusic@gmail.com>, Joe Cooley <cooleyjoe011@gmail.com>, Judith Meyers <judy@musiclaw.com>

Dear Mr. Oliver: We appreciate the update and look forward to receiving the documents. After we receive your documents, we can certainly discuss a remote, video deposition but it will be held in a law office in California with our local counsel attending in person. I will be conducting the deposition remotely and it will be video and stenographic.

Dorothy M. Weber, Esq.

Herbsman Hafer Weber & Frisch, LLP

494 Eighth Avenue, Suite 600

New York, NY 10001

Direct Dial: (646) 795-6068

Fax: (212) 956-6471

E-Mail: [dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)

<http://www.linkedin.com/in/dorothymweberesq/>





---

## DEFENDANTS ANSWERS/RESPONSES AND PRODUCTION

7 messages

---

**Rodney** <rodneylivermusic@gmail.com>

Fri, Jul 18, 2025 at 10:07 AM

To: Dorothy Weber <dorothy@musiclaw.com>, jameyers68@gmail.com



Ms. Weber

I have attached everything I can in my possession. I haven't continued to be working in good faith despite your claims of me having not too. I even went as far as to prepare them as close as I possibly could to the legal standard and what you're used to to avoid any confusion but it seems that that delay has caused me scrutiny in court

Please see attached.

---

### 2 attachments

-  **JULY 16, 2025.docx (1).pdf**  
67 KB
-  **Rodney\_Oliver\_Discovery\_Complete\_Merged (1).pdf**  
283 KB

---

**Dorothy Weber** <dorothy@musiclaw.com>

Fri, Jul 18, 2025 at 11:12 AM

To: Rodney <rodneylivermusic@gmail.com>, Judith Meyers <judy@musiclaw.com>

Dear Mr. Oliver: Would you kind provide the name of the counsel to whom you refer in your privilege log. Thank you in advance for your cooperation.

Dorothy M. Weber, Esq.

Herbsman Hafer Weber & Frisch, LLP

494 Eighth Avenue, Suite 600

New York, NY 10001

Direct Dial: (646) 795-6068

Fax: (212) 956-6471

E-Mail: [dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)

<http://www.linkedin.com/in/dorothymweberesq/>

[Quoted text hidden]

---

**Rodney** <rodneyolivermusic@gmail.com>  
To: Dorothy Weber <dorothy@musiclaw.com>

Fri, Jul 18, 2025 at 11:16 AM

Sorry Ryan Powers and Fox Rothschild sorry I assumed you knew since you dealt with them.

[Quoted text hidden]

---

**Ricardo Rosado** <ricardo@musiclaw.com>  
To: Rodney <rodneyolivermusic@gmail.com>  
Cc: Dorothy Weber <dorothy@musiclaw.com>, Judith Meyers <judy@musiclaw.com>

Mon, Jul 21, 2025 at 2:24 PM

Dear Mr. Oliver,

In reviewing the documents that you provided, no bates-stamped documents have been produced. Can you send the bates-stamped documents that you reference?

Sincerely,

Ricardo Rosado

Legal Assistant to Dorothy M. Weber, Esq.

Herbsman, Hafer, Weber & Frisch, LLP

494 Eighth Avenue, 6th Floor

New York, New York 10001

Phone: 646 – 795 - 6064

Fax: (212) 956-6471

Email: [ricardo@musiclaw.com](mailto:ricardo@musiclaw.com)

---

**From:** Rodney <[rodneyolivermusic@gmail.com](mailto:rodneyolivermusic@gmail.com)>  
**Sent:** Friday, July 18, 2025 1:08 PM  
**To:** Dorothy Weber <[dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)>; [jameyers68@gmail.com](mailto:jameyers68@gmail.com)  
**Subject:** DEFENDANTS ANSWERS/RESPONSES AND PRODUCTION

Ms. Weber

[Quoted text hidden]

---

**Rodney** <rodneyolivermusic@gmail.com>

Mon, Jul 21, 2025 at 2:37 PM

To: Ricardo Rosado <ricardo@musiclaw.com>  
Cc: Dorothy Weber <dorothy@musiclaw.com>, Judith Meyers <judy@musiclaw.com>, Joe Cooley <cooleyjoe011@gmail.com>

Ms. Weber  
I provided cover sheets that reference the bates stamp of the documents following  
I did the best I could in order to get them to you, since you told the judge I was refusing.

Ms. Weber are your responses your final submission. You still haven't providing proof of having the authority to file this lawsuit. I asked you directly for the documents that state you do. You also refuse to provide where in the deposit sheet music that I allegedly copied. Also are you going to provide that letter by Warner you told the judge you would to prove joint ownership? I can not find that joint ownership agreement in the documents you sent over.

Thanks for your attention to this  
Rodney  
[Quoted text hidden]

---

**Dorothy Weber** <dorothy@musiclaw.com> Mon, Jul 21, 2025 at 2:40 PM  
To: Rodney <rodneyolivermusic@gmail.com>, Ricardo Rosado <ricardo@musiclaw.com>  
Cc: Judith Meyers <judy@musiclaw.com>, Joe Cooley <cooleyjoe011@gmail.com>

Ricardo simply told you that we did not receive the documents that you had identified as being bate stamped. If you emailed them, Ricardo is simply asking that you re-send them since we did not receive the first set. Thank you in advance.

Dorothy M. Weber, Esq.  
Herbsman Hafer Weber & Frisch, LLP  
494 Eighth Avenue, Suite 600  
New York, NY 10001  
Direct Dial: (646) 795-6068  
Fax: (212) 956-6471  
E-Mail: [dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)  
<http://www.linkedin.com/in/dorothymweberesq/>

[Quoted text hidden]

---

**Rodney** <rodneyolivermusic@gmail.com> Mon, Jul 21, 2025 at 2:43 PM  
Draft To: Dorothy Weber <dorothy@musiclaw.com>



On Mon, Jul 21, 2025, 2:40 PM Dorothy Weber <[dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)> wrote:

Ricardo simply told you that we did not receive the documents that you had identified as being bates stamped. If you emailed them, Ricardo is simply asking that you re-send them since we did not receive the first set. Thank you in advance.

Dorothy M. Weber, Esq.

Herbsman Hafer Weber & Frisch, LLP

494 Eighth Avenue, Suite 600

New York, NY 10001

Direct Dial: (646) 795-6068

Fax: (212) 956-6471

E-Mail: [dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)

<http://www.linkedin.com/in/dorothymweberesq/>

---

**From:** Rodney <[rodneyolivermusic@gmail.com](mailto:rodneyolivermusic@gmail.com)>

**Sent:** Monday, July 21, 2025 5:37 PM

**To:** Ricardo Rosado <[ricardo@musiclaw.com](mailto:ricardo@musiclaw.com)>

**Cc:** Dorothy Weber <[dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)>; Judith Meyers <[judy@musiclaw.com](mailto:judy@musiclaw.com)>; Joe Cooley <[cooleyjoe011@gmail.com](mailto:cooleyjoe011@gmail.com)>

**Subject:** Re: DEFENDANTS ANSWERS/RESPONSES AND PRODUCTION

Ms. Weber

I provided cover sheets that reference the bates stamp of the documents following

I did the best I could in order to get them to you, since you told the judge I was refusing.

Ms. Weber are your responses your final submission. You still haven't providing proof of having the authority to file this lawsuit. I asked you directly for the documents that state you do. You also refuse to provide where in the deposit sheet music that I allegedly copied. Also are you going to provide that

Thanks for your attention to this

Rodney

On Mon, Jul 21, 2025, 2:24 PM Ricardo Rosado <[ricardo@musiclaw.com](mailto:ricardo@musiclaw.com)> wrote:

Dear Mr. Oliver,

In reviewing the documents that you provided, no bates-stamped documents have been produced. Can you send the bates-stamped documents that you reference?

Sincerely,

Ricardo Rosado

Legal Assistant to Dorothy M. Weber, Esq.

Herbsman, Hafer, Weber & Frisch, LLP

494 Eighth Avenue, 6th Floor

New York, New York 10001

Phone: 646 – 795 - 6064

Fax: (212) 956-6471

Email: [ricardo@musiclaw.com](mailto:ricardo@musiclaw.com)

---

**From:** Rodney <[rodneyolivermusic@gmail.com](mailto:rodneyolivermusic@gmail.com)>

**Sent:** Friday, July 18, 2025 1:08 PM

**To:** Dorothy Weber <[dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)>; [jameyers68@gmail.com](mailto:jameyers68@gmail.com)

**Subject:** DEFENDANTS ANSWERS/RESPONSES AND PRODUCTION

Ms. Weber

I have attached everything I can in my possession. I haven't continued to be working in good faith despite your claims of me having not too. I even went as far as to prepare them as close as I possibly could to the legal standard and what you're used to to avoid any confusion but it seems that that delay has caused me scrutiny in court

Please see attached.



---

## DISCOVERY REQUEST

2 messages

---

**Rodney** <rodneyolivermusic@gmail.com>

Wed, Jul 16, 2025 at 7:37 AM

To: Dorothy Weber <dorothy@musiclaw.com>, Joe Cooley <cooleyjoe011@gmail.com>, jameyers68@gmail.com

Ms Weber

I have been working around the clock to gather all that I could. Spent the night learning about bates numbering. I will be numbering them today and send them to you as soon as I am finished. I am not refusing or trying to delay. Please stop saying I am. I am doing all I can.

Regarding Deposition. I request to do so remotely. I do not have the funds to go to New York.

Thank you

Rodney Oliver

---

**Dorothy Weber** <dorothy@musiclaw.com>

Wed, Jul 16, 2025 at 9:13 AM

To: Rodney <rodneyolivermusic@gmail.com>, Joe Cooley <cooleyjoe011@gmail.com>, Judith Meyers <judy@musiclaw.com>

Dear Mr. Oliver: We appreciate the update and look forward to receiving the documents. After we receive your documents, we can certainly discuss a remote, video deposition but it will be held in a law office in California with our local counsel attending in person. I will be conducting the deposition remotely and it will be video and stenographic.

Dorothy M. Weber, Esq.

Herbsman Hafer Weber & Frisch, LLP

494 Eighth Avenue, Suite 600

New York, NY 10001

Direct Dial: (646) 795-6068

Fax: (212) 956-6471

E-Mail: [dorothy@musiclaw.com](mailto:dorothy@musiclaw.com)

<http://www.linkedin.com/in/dorothymweberesq/>



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Barry White Family Trust U/A/D December 19, 1980,  
Plaintiff,

v.

Rodney David Oliver,  
Defendant.

Case No. 1:24-cv-07509 (DLC)

**CERTIFICATE OF SERVICE**

I hereby certify that on July 25, 2025, I caused a true and correct copy of the attached

MOTION TO COMPEL PRODUCTION OF

Response to Plaintiffs' Motion for Sanctions

to be served via email upon the following:

Dorothy M. Weber, Esq.  
Shukat Arrow Hafer Weber & Herbsman, LLP  
494 8th Avenue, Suite 600  
New York, NY 10001  
Email: dorothy@musiclaw.com

Judith Ann Meyers, Pro Se  
Barry White Family Trust U/A/D December 19, 1980  
Email: jameyers68@gmail.com

Joe Cooley, Pro Se  
248 E 157th Street  
Gardena, CA 90248  
Email: cooleyjoe011@gmail.com

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Respectfully submitted,

/s/ Rodney David Oliver  
Rodney David Oliver (Pro Se Defendant)  
11074 Oso Avenue  
Chatsworth, CA 91311  
rodneyolivermusic@gmail.com

Dated: July 25 , 2025